



August 2, 2017

Mr. Peter Ramanauskas  
TSCA/PCB Coordinator  
USEPA  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Subject: Request for PCB Discharge Cleanup Site Coordinated Approval in Wisconsin,  
BRRTS #02-28-555133 – SPX Corporation former Lindberg/MPH Facility, 304  
Hart Street, Watertown, WI 53094 (The "Facility")

Dear Mr. Ramanauskas:

SPX Corporation (SPX), as the Responsible Party, as that term is required to be used under applicable regulations, is submitting this letter regarding the above stated Facility as a formal request for a TSCA coordinated approval, to be led by the Wisconsin Department of Natural Resources (WDNR), as authorized in 40 CFR 761.77, and in accordance with the One Cleanup Program Memorandum of Agreement between USEPA and WDNR.

SPX had previously submitted a Revised Report and Cleanup Plan on December 22, 2014 notifying USEPA that it intended to conduct a "self-implementing on-site cleanup and disposal of PCB remediation waste" for the property located at 304 Hart Street in Watertown, Wisconsin to address PCB contaminated concrete flooring that was identified in the Facility. The demolition, removal and disposal of all wastes associated with the Facility was completed in 2015.

After demolition of the Facility and concrete slab removal was completed, samples were collected from the upper surface soils and laboratory analyzed for PCBs. With the exception of one area, in the northwest section of the Facility where a former sump had been located, all of the results for the soil samples collected under the concrete slab were less than the industrial direct contact RCL of 0.74 mg/kg, which was the industrial direct contact RCL for Aroclor 1260 at the time of the "self-implementing on-site cleanup and disposal" action. In this former sump area, Aroclor concentrations were 0.933 mg/kg. Therefore, on April 21, 2015, approximately 14.91 tons of soil were removed and transported to Waste Management - Deer Track Park Landfill in Watertown, Wisconsin for disposal in compliance with applicable regulations.





After the soil removal was complete, verification samples were again collected and analyzed to ensure that the remaining soils did not exceed the WDNR industrial direct-contact soil RCL for Aroclor 1260. These verification samples confirmed that no additional remedial action was necessary for the soils that were located under the former Facility (sump area). After the demolition was complete, and at the direction of WDNR, additional soil samples were collected from the adjacent residential properties located at 1115 and 1117 South 3<sup>rd</sup> Street and analyzed for PCBs.

As Aroclor 1260 was the only PCB Aroclor detected on the adjacent non-industrial properties, SPX (SPX) has undertaken soils investigations to determine the presence of the extent of Aroclor 1260 at the direction of WDNR and with permission from the property owner of 1115, 1117, and 1129 South 3<sup>rd</sup> Street (Mr. William Liebhart).

In order to completely define the horizontal extent of the presence of Aroclor 1260 at the residential properties, additional samples were collected from 304 Hart Street, south of 1117 S. 3<sup>rd</sup> Street in what was formerly a driveway/loading dock area for the Facility and is now a parking lot area. The results for the soil samples collected in this parking lot area show Aroclor 1260 concentrations which exceed the current industrial RCL of 1.0 mg/kg at multiple boring locations at approximately 5 feet below ground surface (bgs). Concentrations ranged from less than the limit of detection to 210 mg/kg. These results show what may be a historic spill (source of the discharge and concentration is unknown) that occurred on that portion of the SPX property.

SPX has submitted all of the data from the site investigation activities at the properties described above to the WDNR, and is in the process of finalizing the Remedial Action Investigation and Design Report. However, the proposed schedule for implementation of the remedial action plan is unknown at this time. The Liebhart's, owners of the adjacent properties (1115, 1117, and 1129 South 3<sup>rd</sup> Street), have commenced litigation against SPX, TRC, and Apollo Dismantling, and at the time of this request SPX does not have access to the above listed properties. The pending litigation will dictate the project schedule and may affect soil removal volumes.

SPX is aware of and will adhere to the TSCA PCB reporting and recordkeeping requirements at subparts J and K of 40 CFR 761. SPX requests your approval for the WDNR to be project lead per the One Cleanup Plan Memorandum of Agreement. Project Contacts are as follows:





**Responsible Party**

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Wisconsin Department of Natural Resources

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Sincerely,

Walter Galacki

Global Director Environmental, Health and Safety – SPX Corporation

cc: Nate Nemani – USEPA

Jeff Ackerman – WDNR

Gary A. Edelstein – WDNR

Al Floro – Nixon Peabody

Dave McNichol – TRC Environmental Corporation

